



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Commission Secretary's Office *Seef*

DATE: August 20, 2013

SUBJECT: Comment on Draft AO 2013-08
(American Veterinary Medical Association)

Attached is a timely submitted comment from Islam R. Jones, III, counsel for the requestor.

This matter is on the August 22, 2013 Open Meeting Agenda.

Attachment

AVMA



American Veterinary Medical Association

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August 20, 2013

To: Office of the Commission Secretary
Via Email: AO@FEC.gov (cc: ABell@FEC.gov)

Re: Comments on Draft AO 2013-08

The AVMA would like to thank the Commission for its timely action regarding the AVMA's advisory opinion request. The AVMA agrees with the draft opinion (Draft AO 2013-08) in all respects but would like to clarify the following factual matters:

- Page 1, Line 25: The draft AO recites part of the AVMA mission, which appears in the AVMA Bylaws under Article 1, Section 3, not Section 2.
- Page 3, Line 8: The draft AO states that there are 32 chapters of SAVMA. There are actually 33 Student Chapters of the AVMA rather than SAVMA. SAVMA itself does not have any chapters.
- Page 3, Lines 11-12: The draft AO states that two people on AVMA staff work with the AVMA Student Advisor and the AVMA Vice President to arrange visits to each campus with a SAVMA chapter. Two clarifications: First, the AVMA Student Advisor is actually on AVMA staff. Second, the AVMA Student Advisor and AVMA Vice President visit each campus with a Student Chapter of the AVMA, not SAVMA chapters since SAVMA has no chapters.
- Page 3, Line 15: The draft AO refers to SAVMA chapter officers, but it should refer to officers of Student Chapters of the AVMA.
- Page 4, Lines 6-7: The draft AO states that the SAVMA President and President-Elect are full voting delegates in the AVMA House of Delegates. Technically, the alternate delegate from each organization in the House of Delegates votes only when the delegate is not present to vote. The correct citation to the AVMA Bylaws is Article VII, Section 2(d) and Section 15.
- Page 4, line 16: The AO states that SAVMA members may participate in the AVMA Group Health and Life Insurance program. SAVMA members may also participate in the AVMA Professional Liability Insurance Trust program as well.
- Page 6, lines 4-6: The draft AO states that the voting members of the AVMA elect the Executive Board and the Officers of Delegates. However, AVMA voting members elect district directors, which comprise 11 of the 15 directors. The Commission may wish to state that AVMA voting members elect the majority of the directors on the Executive Board. In addition, AVMA voting members do not elect the delegates or alternate delegates to the House of

Delegates. These individuals are appointed by the organizations which they represent. AVMA Bylaws, Article VII, Section 8.

- **Page 7, line 17. The draft AO states that the SAVMA President and President-Elect have full voting rights in the AVMA House of Delegates. As stated earlier, the alternate delegate (SAVMA President-Elect) would only vote in the absence of the delegate (SAVMA President). This is the same for all organizations in the House of Delegates, not just SAVMA.**
- **Page 7. Lines 18-21: The draft AO states that SAVMA members may participate in the AVMA Group Health and Life Insurance program. SAVMA members may also participate in the AVMA Professional Liability Insurance Trust program as well.**

Please feel free to contact me with any questions. I can be reached at (847) 285-6708 or by email at jjones@avma.org. I will also be available to address questions at the public meeting on August 22, 2013.

Sincerely,



**Isham R. Jones, III
General Counsel
American Veterinary Medical Association**
